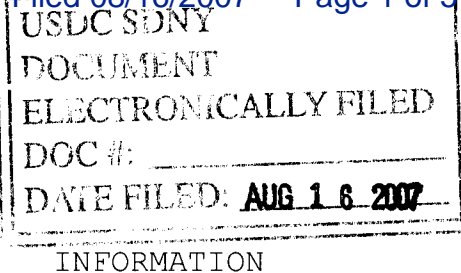


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

CHANG ZHEN JIN,

Defendant.

07 Cr.

07 CRIM. 772

COUNT ONE

(Conspiracy to Traffic in Counterfeit Goods)

The United States Attorney charges:

Statutory Allegations

1. From at least in or about December 2002 up to and including on or about June 3, 2004, in the Southern District of New York and elsewhere, CHANG ZHEN JIN, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, to wit, to violate Section 2320 of Title 18, United States Code.

Object of the Conspiracy

2. It was a part and an object of the conspiracy that CHANG ZHEN JIN, the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did intentionally traffic and attempt to traffic in goods and services and knowingly use a counterfeit mark on and in connection with such goods and services, in violation of Section 2320 of Title 18,

Judge McMahon

United States Code.

The Means and Methods of the Conspiracy

3. Among the means and methods by which CHANG ZHEN JIN, the defendant, and his co-conspirators would and did carry out the conspiracy were the following:

a. JIN and his co-conspirators received shipments of handbags, luggage, accessories and other items inscribed with counterfeit trademarks of designers such as Louis Vuitton. These shipments included approximately 14 cargo containers of counterfeit goods sent from a company in China called "Zhejiang Li Sui Laikesi Chest and Bag" d/b/a "Zhejiang Wei Da Leather" ("Wei Da Leather"). Most of the shipments arrived in California and were then transported by train to the Port of Newark, New Jersey where they remained under the control of the United States Bureau of Customs and Border Protection ("BCBP") until cleared for entry into the United States.

b. In order to ensure that the shipments of counterfeit designer merchandise passed through the BCBP, members of the conspiracy paid thousands of dollars in bribes to an agent of the Department of Homeland Security, Immigration and Customs Enforcement ("ICE") who was acting in an undercover capacity ("UC") and posing as an individual who was able through corrupt means to clear shipments through BCBP without inspection.

c. Members of the conspiracy gave the UC shipment

numbers or documentation for each shipment they wanted the UC to pass through BCBP without inspection. They further arranged for the UC to deliver the shipments of counterfeit designer merchandise cleared through BCBP to storage facilities in Queens, New York.

d. On approximately five occasions, JIN and his co-conspirators helped unload the shipments of counterfeit designer merchandise at the storage facilities in Queens, New York.

e. JIN and his co-conspirators then sold the counterfeit goods to the public in Manhattan and elsewhere.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, CHANG ZHEN JIN, the defendant, and his co-conspirators, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about December 2002, a co-conspirator not named as a defendant herein met with a seller of counterfeit designer handbags in New York, New York.

b. On or about October 8, 2003, in Queens, New York, JIN agreed to buy from a co-conspirator, not named as a defendant herein, approximately \$200,000 worth of counterfeit Louis Vuitton merchandise.

c. On or about December 4, 2003, in Queens, New York, JIN helped to unload a 40 foot container loaded, in part, with counterfeit Louis Vuitton merchandise.

(Title 18, United States Code, Section 371.)



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United States Attorney

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INFORMATION

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(Title 18, United States Code,
Section 371)

MICHAEL J. GARCIA
United States Attorney
